

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

WANDA OVALLES, INDIVIDUALLY : Case No. 3:14-CV-137-M-PAS
AND P.P.A. A.O., AND WILSON OVALLES, :
 :
Plaintiff, :
 :
-v- :
 :
SONY ELECTRONICS, INC., BEST BUY :
CO., INC., FOXCONN INTERNATIONAL, :
INC., AND JOHN DOE CORPORATIONS 1- :
4, :
 :
Defendant. :
 :

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME
TO REPLY TO SONY ELECTRONICS' OPPOSITION TO
PLAINTIFFS' MOTION FOR SANCTIONS FOR SONY ELECTRONICS, INC.'S
FAILURE TO COMPLY WITH THE FEDERAL RULES OF CIVIL PROCEDURE
AND THE COURT'S JUNE 29, 2016 DISCOVERY ORDER**

Now come the plaintiffs and hereby request a seven-day extension of time to complete their Reply Memorandum of Law in Further Support of Plaintiffs' Motion for Sanctions (ECF 94), to October 14, 2016. As grounds for their request, plaintiffs note that: [1] on October 1, 2016, Sony Electronics produced over 7,000 pages of new documents, which bears on the motion for sanctions; [2] on October 5, 2016, Sony Electronics' corporate designee, Mr. Posse, provided additional testimony, much of which likewise bears on the motion for sanctions and belongs before the Court; and [3] plaintiffs have significant concerns with Sony Electronics' recent productions, namely, issues with non-compliance with the agreed-to Format for the Production of documents that shield where the documents are coming from, which likewise bears on the motion for sanctions and may be capable of resolution. Based on the foregoing, plaintiffs respectfully request their

Motion for Extension of Time be granted, and the due date for plaintiffs' reply brief be extended to October 14, 2016.

Dated: October 7, 2016

Respectfully submitted,

PLAINTIFF WANDA OVALLES, INDIVIDUALLY
AND P.P.A ADRIAN OVALLES, AND WILSON
OVALLES

By: /s/ Miriam Weizenbaum

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*Attorneys for Plaintiff Wanda Ovalles, on behalf of
herself and her son, A.O.*

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2016, the foregoing memorandum of law was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Miriam Weizenbaum

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